

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

DALLEN AND PEGGY WENDT,)
Plaintiffs,)
v.) Case No. 1:08-CV-03612
) Judge Castillo
HANDLER, THAYER & DUGGAN, LLC,)
ET AL.) Magistrate Judge Cole
Defendants.)

**DEFENDANTS' UNOPPOSED MOTION TO EXTEND
TIME TO ANSWER, PLEAD OR OTHERWISE RESPOND**

Defendants, Handler, Thayer & Duggan, LLC, James M. Duggan, Thomas J. Handler, Steven J. Thayer and Gregory Bertsch (collectively “HTD”), respectfully move this Court for an extension until August 11, 2008, to answer, plead or otherwise respond to Plaintiffs' Complaint. In support of this motion, HTD states as follows:

1. Plaintiffs filed an eight-count Complaint on June 24, 2008.
 2. The deadline for at least one of the Defendants being represented by the undersigned counsel to answer, plead or otherwise respond to Plaintiffs' Complaint is July 21, 2008.
 3. Because the undersigned counsel was only recently retained to represent HTD and, thus, needed additional time to investigate the complex allegations set forth in the Complaint, the undersigned counsel contacted Plaintiffs' counsel to request an extension of time to answer, plead or otherwise respond to the Complaint.
 4. Plaintiffs' counsel agreed that HTD could have until August 11, 2008 to answer, plead or otherwise respond to the Complaint.
 5. HTD therefore requests additional time to answer, plead or otherwise respond to Plaintiffs' Complaint.

6. Plaintiffs will not be prejudiced by the delay.

WHEREFORE, Defendants, Handler, Thayer & Duggan, LLC, James M. Duggan, Thomas J. Handler, Steven J. Thayer and Gregory Bertsch, respectfully request that this Court grant them an extension until August 11, 2008, to answer, plead or otherwise respond to Plaintiffs' Complaint.

DATED: July 21, 2008

Respectfully submitted,

HANDLER, THAYER & DUGGAN, LLC,
JAMES M. DUGGAN, THOMAS J. HANDLER,
STEVEN J. THAYER AND GREGORY
BERTSCH

By: /s/Barbara B. Edelman
One of Their Attorneys

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LLC, James M. Duggan, Thomas J. Handler, Steven J.
Thayer and Gregory Bertsch

CERTIFICATE OF SERVICE

I hereby certify that on July 21, 2008, I electronically filed the foregoing Defendants' Unopposed Motion to Extend Time to Answer, Plead or Otherwise Respond with the Clerk of the Court using the CM/ECF system, which sent e-mail notification of that filing to the following:

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/s/Barbara B. Edelman